

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

STATE OF NEW JERSEY,

*Plaintiff,*

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, *et al.*,

*Defendants.*

Hon. Brian R. Martinotti

No. 2:23-cv-03885-BRM-LDW

**APPLICATION FOR ADMISSION  
*PRO HAC VICE* OF ROBERTA A.  
KAPLAN PURSUANT TO D.N.J. L.  
CIV.R. 101**

Intervenor-Defendants the Metropolitan Transportation Authority (the “MTA”) and the Triborough Bridge and Tunnel Authority (“TBTA”), by their undersigned counsel, hereby move this Court for an entry of an Order allowing the admission *pro hac vice* of:

Roberta A. Kaplan, Esq.  
Kaplan Hecker & Fink LLP  
350 Fifth Avenue, 63<sup>rd</sup> Floor  
New York, NY 10118

**PLEASE TAKE FURTHER NOTICE** that the undersigned certifies as follows:

1. I will comply with Local Civil Rule 101.1(c) and will be held responsible for the conduct of Roberta A. Kaplan, Esq.
2. I will ensure that Roberta A. Kaplan Esq. complies with Local Civil Rule 101.1(c).
3. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will sign all pleadings, briefs and other papers filed with the Court.
4. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will make all Court appearances required by the Court and the

Local Rules.

**PLEASE TAKE FURTHER NOTICE** that the MTA and TBTA will rely upon the accompanying declaration of Roberta A. Kaplan, Esq. in support of this motion and that no brief is necessary as this motion raises no issue of law and the relief sought is within the Court's discretion.

Dated: October 24, 2023

Respectfully submitted,

/s/ Daniel Chorost

Daniel Chorost  
SIVE, PAGET & RIESEL, P.C.  
560 Lexington Avenue, 15th Floor  
New York, NY 10022  
(646) 378-7207  
dchorost@sprlaw.com

*Counsel for Intervenor-Defendants the  
Metropolitan Transportation Authority and the  
Triborough Bridge and Tunnel Authority*